



June 5, 2025

**VIA ECF**

Hon. Victoria Reznik, USMJ  
United States District Court for the Southern District of New York  
300 Quarropas St.  
White Plains, NY 10601-4150

Re: *Galvan v. Rolling Lawns, Inc. et al.*, Case No. 7:23-cv-06724(CS)(VR)

Dear Judge Reznik:

Plaintiff submits this letter in response to Defendants' letter dated June 2, 2025. Defendants' letter to the Court is unnecessary and premature. As we explained to Mr. Moser, if we are unable to complete Mr. Galvan's deposition in one day, we will work with Defendants' counsel to schedule an additional day for Mr. Galvan on a day that works for all parties (June 10<sup>th</sup> does not work for Plaintiff and Plaintiff's counsel).

Plaintiff is not seeking to prevent Mr. Moser from having a full and fair opportunity to question him, and is willing to entertain questioning beyond the 8-hour limit, but prefers to complete the deposition in a single day (even if it is a long day). To wit, Mr. Moser noticed Plaintiff's deposition to take place at his office on Suffolk County, Long Island—far from Westchester, where the action is pending, and both Plaintiff and Defendants reside—and to date, has been unwilling to move the deposition to an alternate location. To avoid unnecessary cost, travel and delay, Plaintiff expects all parties to make a good-faith effort to complete Mr. Galvan's deposition on June 9<sup>th</sup>.

Very truly yours,

/s/ **Randi M. Cohen**